

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:17-cv-2455 CDP
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

Joint Motion for Protective Order

The parties jointly request this Court enter their proposed protective order. In support, they state:

1. By interrogatory served December 19, 2018, Plaintiffs requested the residential address of a police officer.
2. Plaintiffs seek the residential address because they wish to depose the police officer, but Defendant is unable to produce him for a deposition. Plaintiffs anticipate also that they may need to subpoena the police officer to testify at trial.
3. Because the police officer is not believed to be currently working and Plaintiffs know of no other place where he might be found, Plaintiffs are unable to serve a deposition subpoena without knowing his residential address.
4. Defendant notes that the police officer has served as an undercover officer and expresses concern that public disclosure of his residence address will create a substantial risk to his privacy and security.
5. The parties agree that their conflicting interests would be resolved by entry of a protective order requiring that Plaintiffs keep the address of the police officer

confidential and limiting disclosure of his address as necessary to secure service of a deposition or trial subpoena.

6. The parties submit a proposed protective order, a copy of which is attached hereto and was sent to [MOED Proposed Orders@moed.uscourts.gov](mailto:MOED_Proposed_Orders@moed.uscourts.gov).

WHEREFORE the parties jointly request this Court enter a protective order.

Respectfully submitted,

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